

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Kimberly Roquemore, Individually and as the
Administratrix of the Estate of Maalik Roquemore,
Deceased

Plaintiff,

vs.

Cuyahoga Metropolitan Housing Authority, et al.

Defendant.

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CASE NO. 1:24-CV-1434

JUDGE DONALD C. NUGENT

REPORT OF PARTIES' PLANNING
MEETING UNDER FED. R. CIV.
P. 26(f) AND LR 16.3(b)

1. Pursuant to FED. R. CIV. P. 26(f) and LR 16.3(b), a meeting was held on

November 18, 2024, and was attended by:

David B. Malik counsel for plaintiff(s) Kimberly Roquemore

counsel for plaintiff(s)

Aretta K. Bernard and counsel for defendant(s) All Defendants

Stephanie Olivera Mittica counsel for defendant(s)

2. The parties:

_____ have exchanged the pre-discovery disclosures required by FED. R. CIV. P.

26(a)(1) and the Court's prior order;

☒ will exchange such disclosures by 12/6/2024;

3. The parties recommend the following track:

☐ Expedited ☒ Standard ☐ Complex

☐ Administrative ☐ Mass Tort

4. This case is suitable for one or more of the following Alternative Dispute Resolution (ADR) mechanisms:

☐ Early Neutral Evaluation ☐ Mediation ☐ Arbitration

☐ Summary Jury Trial ☐ Summary Bench Trial

☒ Case not suitable for ADR

5. The parties ☐ do/ ☒ do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

6. Recommended Discovery Plan:

(a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.

The parties will exchange written discovery and take depositions with regard to all claims and defenses asserted

in this matter.

(b) The parties (indicate one):

☐ agree that there will be no discovery of electronically-stored information;

or

☐ have agreed to a method for conducting discovery of electronically-stored information; or

☒ have agreed to follow the default standard for discovery of electronically-stored information (Appendix K to Northern District Ohio Local Rules)

*Following the November 18, 2024, planning call, Plaintiff's counsel proposed that the discovery cut-off date be extended by six months - until December 5, 2025. This would also impact the below dates, with the exception of item #8.

(c) Non- Expert Discovery cut-off date: 6/6/2025

(d) Plaintiff's (or party with the burden of proof on an issue) expert report due

date: Liability: 6/30/2025 Damages: 60 days following ruling on dispositive motion(s)

Defendant's (or party without the burden of proof on an issue) due

date: Liability: 8/29/2025 Damages: 60 days after Plaintiff's expert report

Expert Discovery cut-off date: Liability: 10/30/2025 Damages: 30 days before trial

7. Recommended dispositive motion date: 11/20/2025

8. Recommended cut-off date for amending the pleadings and/or adding additional parties: 12/6/2024

9. Recommended date for a Status Hearing: 5/2/2025

10. Other matters for the attention of the Court:

None at this time.

Attorney for Plaintiff(s) /s/ David Malik (by email approval on 11/19/24)

Attorney for Plaintiff(s) _____

Attorney for Defendant(s) /s/ Aretta K. Bernard

Attorney for Defendant(s) _____
